BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of Application No. 2003-01 SAGEBRUSH POWER PARTNERS, LLC. KITTITAS VALLEY WIND POWER PROJECT	EXHIBIT 90 (GTT-T) COUNSEL FOR THE ENVIRONMENT'S PREFILED DIRECT TESTIMONY

COUNSEL FOR THE ENVIRONMENT'S PREFILED DIRECT TESTIMONY
WITNESS: G. THOMAS TEBB

A. BACKGROUND

Q. Please state your name and business address for the record.

A. G. Thomas Tebb. The address is 15 West Yakima Avenue, Suite 200, Yakima, WA 98902.

Q. Where are you employed?

A. Washington State Department of Ecology (Ecology), Central Regional Office in Yakima, Washington.

Q. What is your position at Ecology?

A. Section Manager, Water Quality Program.

Q. What are your duties and responsibilities as Section Manager?

A. I manage the Water Quality Section in the Central Regional Office, which covers 7 counties: Benton; Chelan; Douglas; Kittitas; Klickitat; Okanogan; and Yakima. The Water Quality Section assures the implementation of water quality laws and regulations. This Section issues state and federal delegated permits, conducts

enforcement actions, regulates nonpoint activities, and ensures that natural resource decisions impacting public, local government, state and federal agencies are consistent with environmental laws, and policies of Washington State. I manage an organization of approximately 28 employees, including two unit managers.

Q. Please identify what has been marked as exhibit GTT-1?

A. Exhibit GTT-1 is a copy of my resume which includes my educational background and professional employment experiences.

Q. Are you familiar with Sagebrush Power Partners LLC's application to build the Kittitas Valley Wind Power Project (KVWPP)?

A. Yes. I was asked by Counsel for the Environment to provide a professional independent analysis of the Kittitas Valley Wind Power Project's Draft Environmental Impact Statement (DEIS) and supporting documentation as it relates to the protection of surface and groundwater in the proposed project area.

Q. What documents have you reviewed?

A. I have reviewed the Application for Site Certification (ASC), the ASC Clarification Information, the DEIS, and the prefiled testimony of Michael Pappalardo and Peggy O'Neil.

Q. Is the information contained in these sections and exhibits within your area of expertise?

A. Yes. I am a Licensed Geologist, Hydrogeologist, and Engineering Geologist (license #408) in the State of Washington. I have over seventeen years of environmental engineering, consulting, complex regulatory problem solving, and management experience that adequately enable me to provide a professional opinion on the matters on which I am being asked to comment.

B. DUST

Q. Do you believe the Applicant's mitigation proposals are adequate?

A. Yes.

Q. Are there any mitigation measures you believe are critical for environmental protection purposes?

A. The most important aspect of protecting surface and groundwater quality will be the effectiveness of the Field Site Management Team in ensuring that the environmental requirements and mitigation measures are followed as closely as planned, and modified as necessary, to prevent any impact to surface and groundwater quality during construction, operation, and reclamation of the project lands after project decommissioning.

Q. Are there any mitigation measures you believe the Applicant should implement that it does not currently intend to implement?

A. No, I believe the applicant has identified and addressed all of the foreseeable potential impacts associated with protection of surface and groundwater quality associated with the project.

C. EROSION

Q. If the project is built and eventually decommissioned, the Applicant has proposed to leave the vast majority of the cement and construction materials anchoring the turbine in the ground. Approximately 26 feet of cement and construction materials will be left behind at each turbine. Do you have any concerns about this material being left in the ground?

A. No, the cement once cured will act and weather much like existing basalt bedrock in the area.

Q. The Applicant has proposed to cement the trenches dug to encase the underground electrical transmission cables laid throughout the project. Do you have any concerns about miles of cement trenches that will be added to the land within the project area?

A. No. The proposed use of cement in the underground electrical trenches for the project is of limited scope, and would be only used in areas were bedrock is at the surface or extremely shallow. The purpose of using cement to encase and adequately protect those electrical transmission cables is reasonable and appropriate. However, it maybe prudent to leave some amount of space (six inches minimum) for natural fill materials to be placed over the cement such that after project decommissioning the electrical trench excavation would better blend with the surrounding landscape.

Q. The Applicant has proposed to leave the trenches in place if the project is decommissioned. Do you have any concerns about leaving these trenches cemented?

A. No. See my response above.

D. EROSION DURING CONSTRUCTION

Q. The Applicant has proposed to utilize Best Management Practices (BMP) in the construction of the project, to reduce erosion concerns. Are there any BMP's that you believe should be required?

A. The most important aspect of protecting surface and groundwater quality will be the effectiveness of the Field Site Management Team in ensuring that the environmental requirements and mitigation measures are followed as closely as planned, and modified as necessary, to prevent any impact to surface and groundwater quality during construction, operation, and reclamation of the project lands after project decommissioning.

Q. Do you believe the Applicant's mitigation proposals are adequate?

A. Yes.

Q. Are there any mitigation measures you believe are critical for environmental protection purposes?

A. I believe that the applicant has adequately identified and addressed the necessary environmental protection measures for erosion protection for the project.

Q. Are there any mitigation measures you believe the Applicant should implement that it does not currently intend to implement?

A. No. See previous response.

E. STORM WATER RUNOFF

Q. Do you have any concerns regarding storm water runoff?

A. The most important aspect of protecting surface and groundwater quality will be the effectiveness of the Field Site Management Team in ensuring that the environmental requirements and mitigation measures are followed as closely as planned, and modified as necessary, to prevent any impact to surface and groundwater quality during construction, operation, and reclamation of the project lands after project decommissioning.

Q. Do you believe the Applicant's mitigation proposals are adequate?

A. Yes.

Q. Are there any mitigation measures you believe are critical for environmental protection purposes?

A. An effective Field Site Management Team and Quality Assurance /Quality Control (QA/QC) protocols.

Q. Are there any mitigation measures you believe the Applicant should implement that it does not currently intend to implement?

A. No.

F. HAZARDOUS MATERIALS

Q. Do you have any concerns regarding the lubricant the Applicant intends to use in the turbines?

A. No.

Q. Do you believe the Applicant's mitigation proposals are adequate?

A. Yes.

Q. Are there any mitigation measures you believe are critical for environmental protection purposes?

A. Yes, training as necessary to ensure personnel are familiar with and can implement spill prevention and control throughout the various phases of the project.

Q. Are there any mitigation measures you believe the Applicant should implement that it does not currently intend to implement?

A. No.

G. WETLANDS

Q. Do you have any reason to believe there are any other jurisdictional wetlands not identified by the Applicant's experts?

A. No I do not.

Q. Do you have any reason to question the wetland information contained in the documents you have reviewed?

A. No.

Q. Do you believe the Applicant's mitigation proposals are adequate?

A. Yes.

Q. Are there any mitigation measures you believe are critical for environmental protection purposes?

A. Again, a properly trained and empowered Field Site Management Team and QA/QC protocols.

Q. Are there any mitigation measures you believe the Applicant should implement that it does not currently intend to implement?

A. No.